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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	
	§	
PRIMERA ENERGY, LLC	§	CASE NO. 15-51396
21022 Gathering Oak #2101	§	
San Antonio, Texas 78260	§	
BEXAR-TX	§	
Tax ID / EIN: 20-2950313	§	
	§	
DEBTOR.	§	CHAPTER 11

**TRUSTEE'S MOTION FOR APPROVAL OF SALE OF REAL
PROPERTY INTEREST, FREE AND CLEAR OF LIENS
(21022 GATHERING OAKS, SAN ANTONIO, BEXAR COUNTY, TEXAS)**

NOW COMES JASON R. SEARCY, CHAPTER 11 TRUSTEE for Primera Energy, LLC (the "Trustee" and/or "Applicant"), and makes this his Motion for Approval of Sale of Real Property Interest, Free and Clear of Liens (the "Sale Motion"); and in support thereof respectfully represents as follows:

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE

HELD

I.

1.1. The Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157. Venue is appropriate under 28 U.S.C. §§ 1409 and 1409.

II.

2.1. On June 3, 2015, an Order for Relief under Chapter 11 of the United States Bankruptcy Code was entered against **Primera Energy, LLC** (the “Debtor”). On July 10, 2015, the U.S. Trustee filed an Application to appoint a Trustee for this case; and subsequent thereto, on July 13, 2015, Jason R. Searcy was appointed to serve as the Trustee. Jason R. Searcy is the duly appointed and serving Chapter 11 Bankruptcy Trustee for the above-named Debtor.

III.

3.1. A portion of the Debtor’s estate consists of that certain real property interest being generally described as follows:

(a) **NCB 19216, Block 11, Lot 17 (Gathering Oaks)** located at 21022 Gathering Oaks, San Antonio, Bexar County, Texas.

IV.

4.1. The Trustee has been tendered an offer of sale of the above-described real property interest by virtue of a Commercial Contract, (the “Contract”) in the amount of \$1,250,000.00 from Alex Katzman, 10001 Reunion Place, Suite 600, San Antonio, Texas 78216. A copy of the Contract is attached hereto as Exhibit A and incorporated herein for all purposes.

The proposed sales price is for 100% interest in the property.

4.2. Trustee desires to accept the Contract offer and sell the above-described real property interest pursuant to the terms and conditions of the Contract. The Trustee will pay from the closing proceeds all proved liens, taxes and costs of sale (if any), specifically including but not limited to: Bexar County Rd & Flood, SA River Auth, Alamo Com College, Univ Health System, Bexar County, City of San Antonio, North East ISD, Bexar Appraisal District. Upon review of claims filed in this proceeding and at last notification given to the Trustee, Bexar County has a valid claim for ad valorem taxes. Additionally, the Trustee will pay from the closing proceeds (or have deducted from the proceeds) the Estate's share of the realtor's commission, premium for title policy, and other incidental closing expenses that are reasonable and customary in real estate transactions, with the remaining portion of the final sales proceeds being paid to Jason R. Searcy as Trustee for the Bankruptcy Estate.

V.

5.1. To the best of Trustee's knowledge and belief, the prospective purchaser, Alex Katzman, is a disinterested person as defined in 11 U.S.C. § 101(14).

WHEREFORE PREMISES CONSIDERED, Trustee prays for an Order of this Court approving the sale of the real property interest in accordance with the provisions of this Motion and under the terms and conditions set out in the Contract attached hereto as **Exhibit A**; and for such other and further relief as is just.

DATED September 8, 2015.

Respectfully submitted,
SEARCY & SEARCY, P.C.

/s/ Jason R. Searcy
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been forwarded via electronic mail, if available, and/or via regular mail, postage prepaid to each interested party shown below; and was served via regular first class mail to each party shown on the attached Master Service List on or before September 9, 2015 by the service agent, Certificateofservice.com.

/s/ Jason R. Searcy
Jason R. Searcy

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